

# **EXHIBIT 1**

**Archived:** Wednesday, July 30, 2025 11:12:21 AM

**From:** [Rodgers, James](#)

**Sent:** Wed, 25 Jun 2025 22:46:54

**To:** [James Chapman](#) [Roman, Michael](#)

**Cc:** [Rodgers, James](#) [W. Ryan Snow](#) [Mackenzie Pensyl](#) [Mark Nanavati](#) [Zach Jett](#) [Johnson, Dawn](#) [Murphy, Siobhan](#) [Cohen, Harry](#) [Werner, Rachel](#)

**Subject:** RE: [External] Deposition of James Morrissey [CC-US.980000.981028.FID1207794]

**Importance:** Normal

**Sensitivity:** None

---

---

**From:** Rodgers, James <james.rodgers@clydeco.us>

**Sent:** Wednesday, June 25, 2025 6:45 PM

**To:** James Chapman <jchapman@cwm-law.com>; Roman, Michael <Michael.Roman@clydeco.us>

**Cc:** W. Ryan Snow <wrsnow@cwm-law.com>; Mackenzie Pensyl <mpensyl@cwm-law.com>; Mark Nanavati <mnanavati@snllaw.com>; Zach Jett <zjett@butler.legal>; Johnson, Dawn <Dawn.Johnson@clydeco.us>; Murphy, Siobhan <Siobhan.Murphy@clydeco.us>; Cohen, Harry <Harry.Cohen@clydeco.us>; Rodgers, James <James.Rodgers@clydeco.us>

**Subject:** RE: [External] Deposition of James Morrissey [CC-US.980000.981028.FID1207794]

Jim,

Sounds fine. I will let you know tomorrow as to next week for Morrissey.

Yes, agree on joint call. Just send details.

Thanks,  
Jim

James Rodgers

Senior Counsel | Clyde & Co US LLP

Direct Dial: +1 212 702 6771 | Mobile: +1 646 853 4277

**CLYDE&CO**

The Chrysler Building | 405 Lexington Avenue | 16th Floor | New York | NY 10174 | USA  
Main +1 212 710 3900 | Fax +1 212 710 3950 | [www.clydeco.us](http://www.clydeco.us)



Please consider the environment before printing

---

**From:** James Chapman <jchapman@cwm-law.com>

**Sent:** Wednesday, June 25, 2025 6:41 PM

**To:** Rodgers, James <james.rodgers@clydeco.us>; Roman, Michael <Michael.Roman@clydeco.us>

**Cc:** W. Ryan Snow <wrsnow@cwm-law.com>; Mackenzie Pensyl <mpensyl@cwm-law.com>; Mark Nanavati <mnanavati@snllaw.com>; Zach Jett <zjett@butler.legal>; Johnson, Dawn <Dawn.Johnson@clydeco.us>; Murphy, Siobhan <Siobhan.Murphy@clydeco.us>; Cohen, Harry <Harry.Cohen@clydeco.us>

**Subject:** RE: [External] Deposition of James Morrissey [CC-US.980000.981028.FID1207794]

Jim,

We have not offered to pay for Mr. Morrissey's travel. I will require him to sign a consent to attend his deposition in Norfolk in lieu of another subpoena.

I completely agree that deposing him next week is inconvenient. Mike said next Monday would work best so let me know once you check with Travelers.

We will provide our damages expert reports by July 2. It is only the liability experts that need another week to consider Mr. Morrissey's testimony for their reports, assuming we can take the deposition next week. I agree that you should get a corresponding extension for your liability experts. Please let me know if we are in agreement on this.

On the settlement conference date, we already agreed to request that it be canceled in favor of private mediation. As we discussed, we wanted to be able to tell the Court that we have a private mediator lined up, a date, etc. Though we haven't determined who or when that will be, I think it is reasonable that we will do so shortly. If you'd like, we can make a joint call to Judge Leonard's chambers tomorrow and make the request. Just let me know.

Thanks,  
Jim

**James L. Chapman, IV**

---

**CRENSHAW, WARE & MARTIN, P.L.C.**

150 W. Main Street, Suite 1923  
Norfolk, VA 23510  
T (757) 623-3000 | F (757) 623-5735  
E-mail: [jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)

---

[Bio](#) | [Firm Website](#) | [Super Lawyers](#) | [Best Lawyers](#) | [Martindale-Hubbell](#)

This communication is intended only for the recipient(s) named above and may be privileged or confidential. If you are not the intended recipient, any disclosure, distribution or other use is prohibited. If you received this communication in error, please notify Crenshaw, Ware & Martin, P.L.C. at (757) 623-3000 or by return e-mail to [jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)

---

**From:** Rodgers, James <[james.rodgers@clydeco.us](mailto:james.rodgers@clydeco.us)>

**Sent:** Wednesday, June 25, 2025 5:00 PM

**To:** James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>

**Cc:** W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>

**Subject:** RE: [External] Deposition of James Morrissey [CC-US.980000.981028.FID1207794]

CAUTION External Email: This email originated from outside of the CWM network. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Jim,

This is very inconvenient. I need to confer with the client as I have non-negotiable jury duty July 1<sup>st</sup>. I need to get authorization for Mike to attend. Assuming that holds, then up to Mike's schedule. An extra week on your side means an extra week on ours. That would work if mediation is late August or early September. Otherwise, the following week for Morrissey with adjustments on skeds etc.. We also need to know if Norfolk paying to fly Morrissey to Norfolk.

However, before we do anything we need to know if the July 9<sup>th</sup> date is adjourned.

Thanks,  
Jim

---

**From:** James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>

**Sent:** Wednesday, June 25, 2025 4:09 PM

**To:** Rodgers, James <[james.rodgers@clydeco.us](mailto:james.rodgers@clydeco.us)>; Roman, Michael <[michael.roman@clydeco.us](mailto:michael.roman@clydeco.us)>

**Cc:** W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Johnson, Dawn <[dawn.johnson@clydeco.us](mailto:dawn.johnson@clydeco.us)>; Murphy, Siobhan <[siobhan.murphy@clydeco.us](mailto:siobhan.murphy@clydeco.us)>; Cohen, Harry <[harry.cohen@clydeco.us](mailto:harry.cohen@clydeco.us)>

**Subject:** Deposition of James Morrissey

Jim & Mike:

James Morrissey called me a few minutes ago. He apologized for not attending his scheduled deposition yesterday. He told me he will come to Norfolk next week for it.

We can do the deposition here in Norfolk on June 30, July 2, or July 3. Please let me know which of those dates works best for you.

We had expected to have his deposition completed for our experts to consider it for their reports due July 2. Lewis and Furborough will need an additional week, assuming we can depose Mr. Morrissey next week. Is that agreeable?

Thanks,  
Jim

**James L. Chapman, IV**

---

**CRENSHAW, WARE & MARTIN, P.L.C.**

150 W. Main Street, Suite 1923

Norfolk, VA 23510

T (757) 623-3000 | F (757) 623-5735

E-mail: [jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)

---

[Bio](#) | [Firm Website](#) | [Super Lawyers](#) | [Best Lawyers](#) | [Martindale-Hubbell](#)

This communication is intended only for the recipient(s) named above and may be privileged or confidential. If you are not the intended recipient, any disclosure, distribution or other use is prohibited. If you received this communication in error, please notify Crenshaw, Ware & Martin, P.L.C. at (757) 623-3000 or by return e-mail to [jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)

**If our account details change, we will notify these to you by letter, telephone or face-to-face and never by email.**

This email message and any attachments may contain legally privileged and/or confidential information intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution or copying of this message or its attachments is strictly prohibited. If you have received this email message in error, please immediately notify us by telephone, fax or email and delete the message and all attachments thereto. Thank you. Clyde & Co US LLP is a Delaware limited liability law partnership affiliated with Clyde & Co LLP, a multinational partnership regulated by The Law Society of England and Wales.

Disclosure: To ensure compliance with requirements imposed by the IRS in Circular 230, we inform you that any tax advice contained in this communication (including any attachment that does not explicitly state otherwise) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing or recommending to another party any transaction or matter addressed herein.

---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.